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AT ROANOKE, VA

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For Danville

JUN 08 2011

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IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA

United States Ex Rel,
REVEREND WESLEY CARROLL
#1427905, Groc
P. O. Box 1000

Chatham, Va. 24531

PLAINTIFF

4:11-cv-00022

VS.

DEPARTMENT OF THE ARMY

U. S. ARMY RECORDS MANAGEMENT AND DECLASSIFICATION AGENCY
7701 TELEGRAPH ROAD
ALEXANDRIA, VA 22315-3905

COMPLAINT PURSUANT TO FOIA 5 U.S.C. §552 ET. SEQ.

JURY TRIAL DEMAND

INJUNCTIVE RELIEF REQUESTED

And now, this 2nd day of June 2011, comes plaintiff, the Reverend Wesley Carroll, who hereby initiates this action pursuant to 5 U.S.C. §552 et. seq. ^{and 28 U.S.C. §1331}, Jury trial demanded and injunctive relief requested.

Plaintiff is herein operating pro se and seeks this Honorable Courts understanding and leniency in considerations and rulings in this his action against above stated defendants.

Above stated defendants have refused to comply with the FOIA by thier continued refusal and failure to comply and supply records and documents plaintiff had requested, nearly continuously for five years. Still to this date defendants have refused to comply and continue to deny documents or even respond to the many additional letters and requests sent to them by plaintiff.

Said plaintiff requested documents are of URGENT importance to society, plaintiffs' congregation, veterans, American Citizens, and women and children of the United States, designed to inform them, the public, researchers, scholars, students, etc., of the workings of government, including when it fails to function or is broken, allowing corruption and abuses and retaliations.

F A C T S :

1. On or about Sept. 2005, plaintiffs sent FOIA Requests to the defendants and others associated with them. Defendants did NOT send any documents and apparently refused to comply with U. S. Federal and FOIA Law.

2. Plaintiff sent them many more letters over the time period to this date, asking them to comply or and at least respond. Defendants, once again refused to comply with federal mandates of the FOIA .

3. Plaintiff even sent defendants full copies of 5 U.S.C.A. 552 et. seq. and the FOIA and other appropriate laws and regulations, and requests for compliance. Defendants, continued to refuse to comply.

4. Plaintiff then notified defendants that legal actions would be sought and implemented if defendants refusal to comply with the FOIA and other appropriate laws.

5. It is now JUNE of 2011, several years later and defendants continue to REFUSE to comply with U. S. Federal Laws, statutes and regulations.

6. Plaintiff now herein files this complaint civil action to address this matter. Injunctive relief, attorneys fees and costs, damages, jury trial demanded and all other appropriate orders are herein sought to now address this matter.

WHEREFORE, this plaintiff, Reverend Wesley Carroll, seeks and demands the following:

1. - ORDER injunctive relief demanding defendants to furnish plaintiff with information and documents requested, within 10 days, or order sanctions upon defendants in the amount of \$10,500.00 per day of continued non compliance.
2. - Order defendants to pay attorney and costs fees for this action in the amount of \$17,000.00, made payable to plaintiff.
3. - Order defendants to immediately furnish plaintiff with all FOIA documents plaintiff has long been requesting.
4. - Order defendants to pay damages to plaintiff in excess of \$300,000.00 and 24 hour access to defendants department of records.
5. - Issue a declaration that permits all those who have in any way been harmed by defendants actions to receive immediate court redress to vindicate their and their interests.
6. - And all other appropriate orders and orders that Honorable

5. - Issue a declaration that permits all those who have in any way been harmed by defendants actions to receive immediate court redress to vindicate them and their interests.

6. - And all other additional reliefs and Orders this Honorable Court deems appropriate in plaintiffs' interest.

Respectfully submitted,



Reverend Wesley Carroll
#1427905
Green Rock Correctional Center
P.O. Box 1000
Chatham, VA 24531

CERTIFICATE OF SERVICE

I, the above stated plaintiff legal counsel of record hereby certify that this date, I sent a true and correct copy of the enclosed action to defendants captioned via United States First Class Mail.

Addressed to:

DEPARTMENT OF THE ARMY

U. S. ARMY RECORDS MANAGEMENT AND DECLASSIFICATION AGENCY

7701 TELEGRAPH ROAD

ALEXANDRIA, VA 22315-3905

Respectfully submitted,



Reverend Wesley Carroll

Dated: June 1, 2011,

Name: Mr. Wesley Carroll
Number: 1427903
Department of Corrections
Rock Correctional Center
Box 1000
Roanoke, Virginia 24531

The DCC has neither
censored nor
inspected this item
and assumes no
responsibility

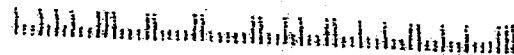


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6-1-2011

Dear Honorable Clerk,

Please process the enclosed and send
me a ticket sheet of each.

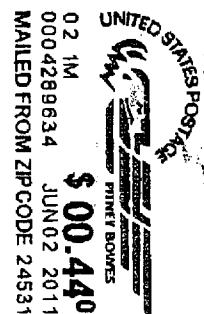
Thank you.

May God Bless,

Reverend W. Carroll

Inmate Name: Mr. Wesley Carroll
Inmate Number: 1427905
Department of Corrections
Green Rock Correctional Center
P. O. Box 1000
Chatham, Virginia 24531

The DOC has neither censored nor inspected this item and assumes no responsibility



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